

JANET LEE HOFFMAN, OSB No. 78114

E-mail: janet@jhoffman.com

JUSTIN RUSK, OSB No. 175946

E-mail: justinr@jhoffman.com

Janet Hoffman & Associates LLC

1000 SW Broadway, Ste. 1500

Portland, OR 97205

Telephone: (503) 222-1125

Attorneys for Defendant Just My Kicks, LLC,

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

EUGENE DIVISION

DAVID STAPLETON in his capacity as
COURT-APPOINTED RECEIVER for the
RECEIVERSHIP ENTITY, including
ZADEH KICKS, LLC dba ZADEH KICKS,
an Oregon limited liability corporation,

Plaintiff,

v.

JUST MY KICKS LLC, a New Jersey limited
liability company.,

Defendant.

CASE NO. 6:24-cv-00056-MK

**DEFENDANT'S NOTICE OF RELATED
CASES**

Defendant submits this Notice of Related Cases pursuant to Local Rule 42-2. The following cases are related in that they involve the same plaintiff (represented by the same counsel), assert the same general claims, and have common questions of law:¹

1. Stapleton v. Just My Kicks, LLC – 6:24-cv-00056-MK;
2. Stapleton v. Idanks LLC – 6:24-cv-00085-MK;

¹ Additionally, four of the identified cases have continuity of counsel by all parties.

3. Stapleton v. Katstrike Inc. – 6:24-00097-MK;
4. Stapleton v. Twenty-Two Shoes LLC – 6:24-cv-00066-AA;
5. Stapleton v. Sneak Peek, LLC – 6:24-cv-000012-MK;
6. Stapleton v. Halavi, Deadstock LA Inc. – 6:23-CV-01977-AA; and
7. Stapleton v. The Keystone Market LLC – 6:24-cv-00051-AA

At this time there is no request to consolidate these actions, but merely to provide notice to the Court of the existence of related cases in the event that motions that would impact all matters, like motions to remand or motions to dismiss, are filed by any party.

DATED: February 5, 2024

/S/ Justin T. Rusk

JUSTIN T. RUSK, OSB No. 175946
Janet Hoffman & Associates LLC
1000 SW Broadway, Ste. 1500
Portland, OR 97205
Phone: (503) 222-1125
Email: Justinr@jhoffman.com
Attorney for Defendant Just My Kicks, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February, 2024, I caused to be served the following

DEFENDANT'S NOTICE OF RELATED CASES on:

Daniel Larsen
805 SW Broadway, Suite 1500
Portland, OR 97205-3325
Counsel for Plaintiff

Oren Bitan
1000 Wilshire Blvd., Suite 1500
Los Angeles, CA 90017-1730
Counsel for Plaintiff

By:
ECF

/S/ Justin T. Rusk

JUSTIN T. RUSK, OSB No. 175946
Janet Hoffman & Associates LLC
1000 SW Broadway, Ste. 1500
Portland, OR 97205
Phone: (503) 222-1125
Email: Justinr@jhoffman.com
Attorney for Defendant Just My Kicks, LLC